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July 10, 2000

VIA FACSIMILE

The Honorable Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Itemized Statement of Telemundo's Costs and Expenses,
MM Docket No. 99-153

Dear Judge Sippel:

Pursuant to your Orders dated June 12, 22, and 28, and July 6, 2000, enclosed please find an itemized accounting of the costs and expenses incurred. We respectfully request that you order Reading to pay the amount set forth in the enclosed accounting.

There are several explanatory comments. First, as I noted in previous correspondence seeking our attorney's fees and expenses, the subpoena in this case sought essentially the same documents from the (WTVE-TV) renewal proceeding that Reading also sought in the Philadelphia federal district court action. Accordingly, in preparing the document production, which was essentially the same in both actions, Telemundo relied on both Washington, D.C. counsel (Dow, Lohnes & Alberttson) to gather the FCC-related documents and Philadelphia counsel (Ballard Spahr Andrews and Ingersoll, LLP) to catalogue and produce them for discovery purposes. For the time entries for the periods when Dow, Lohnes professionals were working on the joint production, the enclosed accounting includes only half of their fees. Moreover, the accounting does not include the costs and expenses of attorneys and legal assistants at Ballard, Spar, which incurred substantial costs and expenses in reviewing and stamping documents and preparing the privilege log, both of which were produced to Reading's FCC counsel. Thus, the figures included in the accounting are very conservative.

Second, as previously noted, the Telemundo billing number for this matter was the general Telemundo Network account. Thus, it included costs for a variety of matters. Since those costs bear no commentary, it is impossible to segregate costs attributable to the FCC proceeding from other costs based on the commentary. Accordingly, the costs presented here were calculated based on a fraction of the total costs billed to the account, the numerator of which fraction was the time spent on this case and the denominator of which was the total hours

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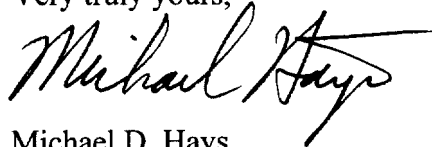
billed to the account. Again, this method of calculation understates the costs because the work for this case involved extensive copying.

With respect to the hardship resulting from the expedited nature of the production in this case, the requirement to produce documents as a non-party to the Reading renewal proceeding created extensive hardships given the need to comply with extremely short deadlines for the document production and the handling of privilege issues.

For example, in Ms. Swanson's case, the need to assemble, review, redact, and produce numerous personal materials required that time be spent evenings and weekend days in order to meet deadlines and produce the material in time for review by counsel for Reading Broadcasting and Adams Communications prior to her testimony. This need and the very short turn-around times had to be sandwiched into an already heavy workload, given several transactions Ms. Swanson was already handling at the time the additional demands were made. Ms. Swanson simply did not have any free blocks of time into which such work could be fit, as explained by the fact that, in May, she billed approximately 190 hours and had unbillable bar commitments of approximately 30 hours and, in June, she billed approximately 210 hours and had unbillable bar commitments of approximately 50 hours. Ms. Swanson repeatedly re-juggled her schedule to meet the Reading-related deadlines. Her other clients experienced delay as a result, and she had to reschedule or completely miss several family obligations. Given the very conservative approach we took in halving many of the time entries, as noted above, the enclosed schedule of hours she devoted to the case should be doubled to reflect the true effect the short deadline had on Ms. Swanson's schedule.

Please advise us if you wish any further information on our fees and expenses.

Very truly yours,



Michael D. Hays

MDH/cjc

cc w/encl. via facsimile: James Shook, Esquire
Thomas J. Hutton, Esquire
Harry F. Cole, Esquire

NON-PARTY TELEMUNDO DISCOVERY EFFORTS AND EXPENSES

Telephone conferences with H. Cole and T. Hutton re upcoming subpoenas and discovery requests; acceptance of service of subpoena; review of same; telephone conferences with client and correspondence to client re same; review firm files; telephone conferences with T. Hutton re production issues; telephone conferences with Telemundo's federal district court counsel re document production; review of firm and client documents; conferences re document production; copying, assembly, and production of documents; review of privilege log; preparation of opposition pleadings on discovery issues; attendance at ALJ discovery conference; review of telephone records, billing records, A. Swanson's work papers, and A. Swanson's personal calendars; redaction, copying, assembly and production of same; assembly of cost and expense data; correspondence to ALJ re same.

PROFESSIONAL FEES

Michael D. Hays (Partner)

Date	Time Related to Document Production	Time Related to Motions Practice & Court Appearances
5/8/00	.9	.3
5/9/00	.3	0
5/10/00	.8	0
5/11/00	.3	0
5/15/00	.4	0
5/17/00	.5	0
5/18/00	.3	0
5/19/00	.5	1.6
5/23/00	0	.7
5/24/00	.7	1.6
5/25/00	0	2.1
5/30/00	0	1.1
6/1/00	0	4.1
6/2/00	0	2.1
6/5/00	0	.1
6/6/00	0	.7
6/7/00	0	.3
6/8/00	0	.9
6/9/00	0	.6
6/12/00	0	4.4
6/13/00	0	2.9
6/14/00	0	3.3
6/15/00	0	3.1
TOTAL HOURS	4.7	29.9
TOTAL FEES @ \$395.00/hr	\$1,856.50	\$11,810.50

M. Anne Swanson (Partner)

Date	Time Related to Document Production	Time Related to Motions Practice & Court Appearances
5/9/00	.9	0
5/10/00	.4	0
5/11/00	1.1	0
5/15/00	.2	0
5/17/00	.3	0
5/18/00	2.6	0
5/19/00	.6	0
5/23/00	.8	0
5/24/00	1.6	0
5/25/00	.9	.9
5/26/00	1.6	0
5/30/00	0	.2
6/1/00	1.3	0
6/2/00	.6	.6
6/4/00	1.6	0
6/5/00	.2	0
6/6/00	1.2	0
6/7/00	1.2	2.0
6/8/00	1.1	0
6/9/00	6.1	0
6/11/00	1.4	0
6/12/00	8.8	0
6/13/00	2.3	0
6/14/00	1.0	.5
6/22/00	0	.2
6/26/00	0	.7
6/27/00	0	.1
6/30/00	0	1.1
TOTAL HOURS	37.8	6.3
TOTAL FEES @ \$340/hr.	\$12,852.00	\$2,142.00

Naira Darius (Legal Assistant)

Date	Time Related to Document Production
5/18/00	.9
5/19/00	1.2
5/30/00	.1
6/8/00	.7
6/9/00	6.7
6/12/00	3.9
6/13/00	2.9
6/14/00	3.9
6/15/00	1.1
TOTAL HOURS	21.4
TOTAL FEES @ \$155/hr.	\$3,317

Margaret E. Vayo (Legal Assistant)

Date	Time Related to Document Production
5/18/00	.7
TOTAL HOURS	.7
TOTAL FEES @ \$150/hr.	\$105.00

Joshua M. Davis (Legal Assistant)

Date	Time Related to Document Production
5/11/00	5.1
5/15/00	1.9
5/17/00	3.3
6/8/00	4.8
6/9/00	4.6
6/12/00	3.2
TOTAL HOURS	22.9
TOTAL FEES @ \$85.00/hr.	\$1,946.50

Stephanie M. Martinez (Legal Assistant)

Date	Time Related to Document Production
5/11/00	.5
TOTAL HOURS	0.5
TOTAL FEES @ \$100/hr.	\$50.00

TOTAL PROFESSIONAL FEES

Name	Time Related to Document Production	Time Related to Motions Practice & Court Appearances
Michael D. Hays	\$1,856.50	\$11,810.50
M. Anne Swanson	\$12,852.00	\$2,142.00
Naira Darius	\$3,317.00	0
Margaret E. Vayo	\$105.00	0
Joshua M. Davis	\$1,946.50	0
Stephanie M. Martinez	\$50.00	0
TOTAL FEES:	\$20,127.00	\$13,952.50

COSTS

Expense	May/June 2000
Photocopying Expenses	\$972.00
Total Other Expenses	\$413.00
TOTAL COSTS:	\$1385.00

NOTE: Total Costs reflects the proportion professional fees listed above to total costs in account for the same period.

TOTAL PROFESSIONAL FEES AND COSTS: \$35,464.50